

Dear FCC Commissioners:  
**03-123**

RE:

Videophone and Video Relay Services are amazing technology advances and God-sent however I do not have equal access like non-deaf.

Functional equivalency in telephone access is paramount. I want to have my own portable 10 digit telephone number for my videophone to ensure equivalency. Having my own 10 digit telephone number will allow me to reach my city's 911 system via video relay service. It is unfair that I have to have two "telephone system" in my house. I do not use my landline phone at all but I keep it because it is the only way I can contact my city's 911 center due to my landline's telephone number which is identified by the 911 system. I want my own 10 digit number for my videophone so I can be recognized by my city's 911 center.

In addition, due to the nature of my contractual business, I make and receive calls from non-deaf clients. I should be able to give them my OWN telephone number with whatever video relay service provider I prefer to use. Currently, I am stuck with many different telephone numbers and IP addresses provided by the various video relay service providers.

Lastly, I want to be able to list my telephone number in my city's telephone directory. Anybody can contact me! Because the 10 digit telephone number is mine and connected to video relay service of my choice, the number will connect me directly to my videophone if the caller uses videophone. The number will connect the non-deaf person to the video relay service in order to connect me.

That is functional equivalent. Please take action to see that this 10 digit telephone number for my videophone so I can receive and make calls like non-deaf individuals and access my 911 center (For years I have paid 911 surcharges that are inaccessible to me and my family).

The 10 digit telephone numbers for videophone should be regulated by NPAC just as the telephone numbers for non-deaf. We do not need a new separate entity which will take awhile to implement as new rules need to be developed, comments to collect, hearings to conduct and so forth. The NPAC has a system in place and can implement telephone numbers for videophone users in a matter of months.

I urge the Commissioners' action and immediate implementation of 10 digit number for videophone users via NPAC to ensure functional equivalency and

access to a 911 center. All it requires is the favorable decision of the Commissioners and an order to NPAC to get the ball rolling and a reality in few months.

Thank you,

Gerald Covell